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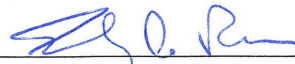
## MEMO ENDORSED

February 18th, 2020

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
Courtroom 619  
40 Foley Square  
New York, NY 10007

The government is directed to respond to Mr. Dawkins' letter by February 25, 2020.

SO ORDERED.

  
\_\_\_\_\_  
Edgardo Ramos, U.S.D.J.

Dated: 2/19/2020  
New York, New York

Re: *United States v. Evans, et al.*  
Case Number: 17-cr-00684-ER  
Christian Dawkins Seized Personal Property

Dear Judge Ramos:

On the date of September 26th, 2017, Defendant Christian Dawkins was arrested in connection with the above-entitled criminal case. At the time of arrest, Mr. Dawkins' was dispossessed of personal property, including two i-phones (one black, one white in color) which 870 days later, a period of over two and a half years, remain unreturned.

It is our position the continued detention of this personal property is not only entirely unnecessary, but has reached a point of being strictly punitive, with no articulated rationale. Given the case has been prosecuted to completion, it would be logical to conclude there exists no further investigative value of the physical devices detained and certainly in 870 days the Federal Bureau of Investigation has been afforded ample opportunity and time to perform extensive data downloads.

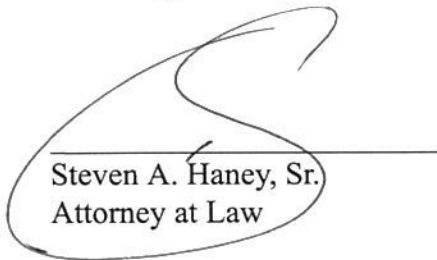
In advance of this request to the Court, counsel for Christian Dawkins has sought concurrence for the relief stated from record counsel of the Southern District of New York. The most recent response from counsel indicated that due to pending appeals, the physical devices

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are evidence and not subject to return. For the reasons stated above, we respectfully disagree and this position seems to be unfounded and belies common sense, as any material evidence should have long been extracted from the seized devices.

For the reasons stated above, Christian Dawkins moves this Honorable Court to Order the i-phones seized on September 26th, 2017 be returned to the care and custody of either Mr. Dawkins or the undersigned counsel.

Sincerely,



Steven A. Haney, Sr.  
Attorney at Law

cc: All Attorneys of Record - via U.S. Court e-filing system